UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

In re: *

    TAKISHA L. HILL   *   Case No. 13-30474-RAG

        Debtor   *   (Chapter 13)

*   *   *   *   *   *   *

OBJECTION TO CONFIRMATION OF PLAN

      Ellen W. Cosby, Trustee, having reviewed the Chapter 13 statement and plan filed in this case, having examined the Debtor at the Section 341 meeting, and having reviewed any additional information and documentation deemed pertinent, objects to confirmation of the Debtor's Fourth Amended Plan filed May 9, 2014 for the reasons stated below.

OUTSTANDING ITEMS FROM PRIOR OBJECTION FILED ON JANUARY 16, 2014:

      1.   The Debtor has failed to provide documentation needed to evaluate whether the plan complies with the confirmation requirements of Chapter 13 (i.e., income documentation for the co-owner of the real property).

NEW OBJECTION(S):

      2.   The calculation for repayment of the secured debt owed Howard County, Maryland in Paragraph 2(e)(ii) of the Plan is incorrect. The Trustee asserts that it would require approximately $3,100.00 to pay the estimated claim at the stated discount rate though the plan.

      3.   The Debtor provides for payment of a secured debt owed Howard County, Maryland in the plan. The Debtor has not listed this creditor in the schedules and has not provided adequate notice of the filing of this case to the creditor.

      4.   The Trustee asserts that the Debtor has failed to dedicate all disposable earnings to the plan, as required by Code §1325(b)(2)(A)(i), based upon the $1,119.00 per month disposable income shown in the Amended Schedule J.

      5.   The Debtor has failed to timely file the required Pre-Confirmation Certification per Local Bankruptcy Rule 3015-2. U.S. Bank, a secured creditor, filed a Motion for Relief From Stay on April 25, 2015 (PACER Docket No. 38).

Dated: May 16, 2014   _/S/ *Ellen W. Cosby*_____
                                        Ellen W. Cosby
                                        300 E. Joppa Road, Suite 409
                                        Baltimore, MD 21286
                                        (410) 825-5923
                                        inquiries@ch13balt.com
                                        Chapter 13 Trustee

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CERTIFICATE OF SERVICE

        I HEREBYCERTIFY that a copy of the foregoing Objection was transmitted electronically through CM/ECF to David H. Sandler, Esquire, attorney for the Debtor and was mailed by first-class mail on May 16, 2014 to the Debtor.

    Takisha L. Hill
    9060-A Moonshine Hollow
    Laurel, MD 20723

                         _/S/ *Ellen W. Cosby*_____
                         Ellen W. Cosby